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March 12, 2024

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
500 Pearl Street  
New York, New York 10007

**Re: *Carroll v. Trump*, No. 1:20-cv-7311-LAK-JLC – Revised Bond Documentation**

Dear Judge Kaplan:

Pursuant to the Court's order of March 11, 2024, ECF No. 322, to submit revised bond documentation promptly, Defendant and the surety have executed the attached rider to the previously submitted bond, which implements the changes discussed in Plaintiff's letter of March 11, 2024, ECF No. 320. Plaintiff's counsel has reviewed this rider and has no objection. We respectfully request that you approve the previously filed bond, ECF No. 318, as modified by the attached rider.

New York, New York  
March 12, 2024

Respectfully submitted,

/s/ Michael T. Madaio  
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\* *Pro Hac Vice* pending  
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